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Client/Matter: 061047-0265649

REMARKS

Reconsideration and allowance of the present patent application based on the foregoing amendments and following remarks are respectfully requested.

By this Amendment, claims 3-7, 10, 13-15, 17-20, 24-26, 30, and 38-41 are amended to clarify the scope of the claims without narrowing the scope of any of the claims. The changes are not being presented in response to any rejection or objection of the claims. No new matter has been added. Claims 1-42 are pending in this patent application.

Entry of this Amendment is proper under 37 C.F.R. §1.116 as the amendments: (a) place the application in condition for allowance for the reasons discussed herein; (b) do not present any new issues that would require further consideration and/or search as the amendments merely amplify issues discussed throughout the prosecution; (c) do not present any additional claims without canceling a corresponding number of claims; and (d) place the application in better form for appeal, should an appeal be necessary. Entry of this Amendment is thus respectfully requested.

The Office Action maintains the rejection of claims 1-31, 33 and 35-42 under 35 U.S.C. §103(a) as being unpatentable over United States patent no. US 5,732,400 to Mandler et al. ("Mandler"). Applicants respectfully traverse the rejection because the teachings of Mandler fail to disclose, teach or suggest all of the features in the rejected claims.

In the Office Action, the Examiner submits that the Applicants' "invention, as described in the independent claim, is a buyer working through a third party that authenticates the buyer's and seller's information in a transaction." Applicants respectfully submit that Examiner has mischaracterized the Applicants' claimed invention. While Applicants' claimed invention covers buyers and sellers and involves authentication, Applicants' claimed invention does more than the simplified function of "a third party that authenticates the buyer's and seller's information in a transaction" as disclosed in Mandler.

Specifically, as the Examiner earlier conceded in the Office Action dated February 18, 2003, Mandler fails to disclose "the principal entity storing the forwarded request and transmitting an acknowledgement message to the registrar entity, the acknowledgement stating acceptance and authentication/authorization information that the subscriber entity requires for the requested service" as recited in claim 1. Applicants agree with the Examiner that Mandler fails to disclose this aspect of the claimed invention and further submit that Mandler no where teaches or suggests this aspect of the claimed invention.

Mandler fails to disclose, teach or suggest a principal entity storing the forwarded request and transmitting an acknowledgement message to the registrar entity. While Mandler

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discloses a clearinghouse that stores certain data, Mandler does not disclose, teach or suggest a principal entity - a seller - storing a request. Storing a request by a principal entity is significant in the context of the use of a session identifier. *See, e.g.*, Applicants' specification, page 18, lines 15-20 and claim 5. A session identifier may be linked to a particular request and, accordingly, the stored request may be used to process the session identifier, for example, as part of the processing of future responses to the request or as part of a message exchange or transaction associated with the requested service.

Further, Mandler fails to disclose, teach or suggest a principal entity transmitting an acknowledgement stating authentication/authorization information that the subscriber entity requires for the requested service. Mandler simply does not disclose, teach or suggest a principal entity - a seller - transmitting authentication/authorization information that the subscriber entity - a buyer - requires for the requested service. Such authentication/authorization information can be used, for example, where the subscriber entity wishes to securely receive the requested service from the principal entity. With such information, the subscriber entity may establish a direct secure connection with the principal entity so that the principal entity may provide the requested service to the subscriber entity without an intermediary registrar entity.

Applicants' submit that the Examiner has not made out a *prima facie* of obviousness here. As far as Applicants' can identify from the passages cited by the Examiner, the only information sent by a seller in Mandler is a quote in response to a buyer RFQ and an acceptance / rejection of a PO. Applicants submit there is simply no disclosure, teaching or suggestion of a principal entity transmitting an acknowledgement message, the acknowledgement stating, in addition to acceptance, authentication/authorization information that the subscriber entity requires for the requested service.

The Examiner refers generally to Mandler teaching the use of "request for quotes [RFQ], for the requested services from the seller and the use of purchase orders [PO] with their obvious safeguards and standard procedures" to fashion the rejection of the claims. Applicants respectfully submit that this teaching in Mandler is unavailing. Applicants note that the requests for quotes and purchase orders in Mandler originate from a buyer. Consequently, they are clearly not applicable or relevant to an acknowledgement transmitted by a seller. There is simply no teaching or suggestion of the claimed acknowledgement message from Mandler's disclosure of the use of RFQs and POs. Further, the Examiner fails to specify the "obvious safeguards and standard procedures" that allegedly are associated with RFQs and POs. As a general proposition, the possibility of fraudulent RFQs and POs is

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well-known and the ways to make them more secure are infinite.

In Mandler, a clearinghouse is provided as an intermediary to each step of a transaction between a seller and buyer to help facilitate security, at least in part. The clearinghouse in Mandler verifies that the buyer is registered with the clearinghouse and performs a "hard authorization" of the transaction when the buyer sends a PO in response to a quote from a seller. Contrary to the Examiner's assertion, Applicants find no teaching in Mandler regarding the processing of a transaction without a "middle entity [clearinghouse]." In both described embodiments, a clearinghouse is used to facilitate processing of transactions. In the second embodiment, an additional broker is required. Thus, the clearinghouse of the Mandler system has the information needed to authorize and verify the buyer and seller. Both the buyer and seller must communicate with the clearinghouse to process the transaction securely.

In contrast, the claimed invention does not require every step of a transaction between a seller and buyer to pass through an intermediary. As discussed above, authentication/authorization information included in an acknowledgment from a principal entity may be used, for example, where the subscriber entity wishes to securely receive the requested service from the principal entity directly without using an intermediary registrar entity to verify the buyer and seller.

Lastly, Applicants respectfully submit that Mandler fails to disclose, teach or suggest a method of "registering a subscriber entity of a plurality of entities at a principal entity of a plurality of entities" as recited in claim 1. As described above, Mandler discloses an on-line transactional services system. In Mandler, while buyers and sellers may be registered with a clearinghouse and transactions may be facilitated between buyers and sellers through the clearinghouse, Mandler fails to disclose, teach or suggest anything about registering a subscriber entity at a principal entity.

Therefore, for at least the above reasons, Mandler fails to disclose, suggest or teach all the features recited in claims 1-31, 33 and 35-42. Thus, the rejection of claims 1-31, 33 and 35-42 is traversed and claims 1-31, 33 and 35-42 are allowable.

Furthermore, the Office Action maintains the rejection of claims 32 and 34 under 35 U.S.C. §103(a) as being obvious over Mandler in view of U.S. patent no. US 6,336,095 to Rosen ("Rosen"). As applicants submit above that independent claim 1 is not obvious in view of Mandler, applicants accordingly submit that claims 32 and 34, both of which indirectly depend from claim 1, are therefore also not obvious. Thus, for at least the above reasons, the combination of Mandler and Rosen fails to disclose, suggest or teach all the features recited

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in claims 32 and 34. Thus, the rejection of claims 32 and 34 is traversed and claims 32 and 34 are allowable.

All objections and rejections having been addressed, it is respectfully submitted that the present application is in condition for allowance. If questions relating to patentability remain, the examiner is invited to contact the undersigned to discuss them.

Should any fees be due, please charge them to our deposit account no. 03-3975, under our order no. 061047/0265649. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced deposit account.

Respectfully submitted,
PILLSBURY WINTHROP LLP

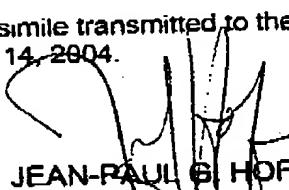


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UNDER 37 C.F.R. §1.8**

I hereby certify that this paper is being facsimile transmitted to the Patent and Trademark Office at (703) 872-9306 on September 14, 2004.



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